



Kaufman Dolowich & Voluck, LLP  
245 Main Street, Suite 330  
White Plains, New York 10601  
Telephone: 914.672.6566  
[www.kdvlaw.com](http://www.kdvlaw.com)

**Alina Nadir**  
Email: [alina.nadir@kdvlaw.com](mailto:alina.nadir@kdvlaw.com)

August 18, 2023

**VIA ECF**

Honorable Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1920  
New York, NY 10007

Re: *Samuel R. Mitchell Jr. v. Planned Parenthood of Greater New York, et. al*  
Case No.: 1:23-cv-01932 (JLR)

Dear Judge Rochon:

The law firm of Kaufman Dolowich Voluck represents Defendants in the above-referenced matter. We write in response to your Honor's August 14, 2023, Order requesting that Defendants advise the Court of their position on Plaintiff's submission seeking leave to file a Second Amended Complaint (filed August 8, 2023, Doc. No. 27).

On August 8, 2023 (prior to Plaintiff's filing of Doc. No. 27), Defendants requested that Plaintiff advise of his position regarding an additional stay on discovery. Defendants also advised that should Plaintiff agree to the stay, Defendants would also not oppose the filing of the Second Amended Complaint. Subsequently, Plaintiff's counsel advised that Plaintiff would not consent to an additional stay.

Defendants do not oppose the filing of the Second Amended Complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alina Nadir", written over a horizontal line.

Alina Nadir  
John E. Mancebo